

EXHIBIT A

TABLE A:
SHOW CAUSE ORDER REQUESTED
PLAINTIFFS WHO HAVE AMENDED/SUPPLEMENTED FACT SHEETS
WITH WHOM DISPUTES REMAIN (THIRD LISTING)

	Plaintiff	Civil Action No.	Law Firm	Core Deficiencies	Deficiency Notice Sent
1.	Butcher, Steven	1:19-cv-14888	Golden Law Office	<p>II.D.2 Plaintiff uses unknown abbreviation "NCS" to refer to previous employer.</p> <p>III.E.2 Failure to provide name of diagnosing healthcare providers or treating healthcare providers; failure to provide address(es) of healthcare providers; failure to provide conditions treated; failure to provide dates of treatment; failure to provide medications prescribed.</p> <p>III.F.3 Failure to provide gross annual income for 2019.</p> <p>V.F.49 Failure to specific whether Plaintiff has had ulcerative colitis.</p> <p>V.G.2 Failure to provide name, address, and other required information about providers.</p> <p>V.G.3 Failure to provide dates of onset for any conditions listed.</p> <p>V.G.4 Failure to provide treatment or outcome for "kidney problems"</p>	2/4/20

				XI.A.1, 2, 3, 6 Failure to provide completed authorizations.	
2.	Caudill, Cheryl	1:19-cv-14900	Golden Law Office	<p>II.D.4.c Failed to respond. Provide dates of exposure for red and/or processed meats.</p> <p>III.C.1 Failed to provide complete information.</p> <p>III.C.2 Failed to provide complete information in entire section.</p> <p>III.E.2.a, b. Failed to respond. If Plaintiff claims a medically diagnosed condition, provide the name of the diagnosing and treating healthcare provider and all other treating healthcare providers.</p> <p>XI.A.1 Plaintiff provides a single, generalized authorization and not one specific to “each health care provider, specialist,” etc. Plaintiff’s authorization is dated, but the instructions ask for an undated form.</p> <p>XI.A.6 Failed to provide properly signed and/or completed authorization. Collateral source rule applies to admissibility of evidence at trial and not the relevance of evidence for the purposes of discovery. Discoverable information includes evidence that may not be admissible at trial.</p>	2/4/20

				<p>Additionally, Plaintiff waived her objection by consenting to the court-approved form of the PFS.</p> <p>XI.A.7 Failed to provide properly signed and/or completed authorization. Plaintiff's form does not contain any provider information. Plaintiff's authorization is dated, but the instructions ask for an undated form.</p>	
3.	Farmer, Douglas	1:19-cv-18582	Moore Law Group PLLC	III.G Failed to respond to questions in this section III.G	2/5/20
4.	Lamhut, Jerold	1:19-cv-13772	Bernstein Liebhard LLP	<p>III.G.a Failure to respond.</p> <p>V.D Failed to provide dates when tobacco use started.</p>	2/5/20

TABLE B:
SHOW CAUSE ORDER REQUESTED
PLAINTIFFS WHO HAVE AMENDED/SUPPLEMENTED FACT SHEETS
WITH WHOM DISPUTES REMAIN (SECOND LISTING)

	Plaintiff	Civil Action No.	Law Firm	Deficiencies	Deficiency Notice Sent
1.	Bell, Ricky	1:19-cv-19135	Ron Austin Law	<p><u>NUMEROUS CORE AND MINOR DEFICIENCIES OR SUBSTANTIALLY INCOMPLETE:</u></p> <p>I.C.2 - Failed to attach records.</p> <p>I.D.1 - Failed to attach records.</p>	2/21/20

				<p>I.D.2 - Failed to respond.</p> <p>I.D.3 - Failed to respond.</p> <p>I.D.4 - Failed to respond.</p> <p>I.D.5 - Failed to respond.</p> <p>I.D.6 - Failed to respond.</p> <p>I.D.7 - Failed to respond.</p> <p>I.D.8 - Failed to respond.</p> <p>II.D.2.d - Failed to provide complete information. - Dates of Employment - Did not list all employers in the past ten years.</p> <p>II.D.4.a - Failed to respond.</p> <p>II.D.4.b - Failed to respond.</p> <p>II.D.4.c - Failed to respond.</p> <p>II.D.4.d - Failed to respond.</p> <p>II.D.4.e - Failed to respond.</p> <p>II.D.4.f - Failed to respond.</p> <p>II.D.4.g - Failed to respond.</p> <p>II.D.4.h - Failed to respond.</p> <p>II.D.4.i - Failed to respond.</p> <p>II.D.4.j - Failed to respond.</p> <p>III.C.2.a.i - Failed to respond.</p> <p>III.C.2.a.ii - Failed to respond.</p> <p>III.C.3.a.i - Failed to provide complete information. - Failure to provide information for response 2</p>	
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				<p>III.C.3.a.ii - Failed to respond.</p> <p>III.C.5 - Failed to provide complete information. - Please specify medication.</p> <p>III.D.2 - Failed to respond.</p> <p>III.G.b - Failed to respond.</p> <p>III.H. - Failed to respond.</p> <p>V.A. - Failed to respond.</p> <p>V.G.4 - Failed to provide complete information. - Please specify medication and outcome.</p> <p>XI.A.1 - Failed to provide properly signed, dated, and completed authorization.</p> <p>XI.A.3 - Failed to provide properly signed, dated, and completed authorization.</p> <p>XI.A.6 - Failed to provide properly signed, dated, and completed authorization.</p> <p>XI.B.1 - Failed to provide records requested.</p> <p>XI.B.2 - Failed to provide records requested.</p> <p>XI.B.9 - Failed to provide records requested.</p> <p>XI.B.10 - Failed to provide records requested.</p> <p>XI.B.18 - Failed to provide records requested.</p>	
2.	Bell, Sandy	1:19-cv-19171	Ron Austin Law	<p><u>NUMEROUS CORE AND MINOR DEFICIENCIES</u></p>	2/21/14

			<p><u>FOR SUBSTANTIALLY INCOMPLETE:</u></p> <p>I.C.2 - Failed to attach records.</p> <p>I.D.1 - Failed to attach records.</p> <p>I.D.2 - Failed to respond.</p> <p>I.D.3 - Failed to respond. - Listed "Other."</p> <p>I.D.5 - Failed to respond.</p> <p>I.D.6 - Failed to respond.</p> <p>I.D.7 - Failed to respond.</p> <p>I.D.8 - Failed to respond.</p> <p>II.D.2.a - Failed to provide complete information. - Failed to provide information regarding current employment at Lowe's. Please clarify</p> <p>II.D.2.b - Failed to provide complete information. - Failed to provide information regarding current employment at Lowe's. Please clarify</p> <p>II.D.2.c - Failed to provide complete information. - Failed to provide information regarding current employment at Lowe's. Please clarify</p> <p>II.D.2.d - Failed to provide complete information. - Failed to provide information regarding current employment at Lowe's. Please clarify</p> <p>II.D.2.e - Failed to provide complete information. - Failed</p>	
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				<p>to provide information regarding current employment at Lowe's. Please clarify</p> <p>II.D.4.a - Failed to respond.</p> <p>II.D.4.b - Failed to respond.</p> <p>II.D.4.c - Failed to respond. - Failed to indicate dates of exposure. Please clarify</p> <p>II.D.4.d - Failed to respond. - Failed to indicate dates of exposure. Please clarify</p> <p>II.D.4.e - Failed to respond.</p> <p>II.D.4.f - Failed to respond.</p> <p>II.D.4.g - Failed to respond.</p> <p>II.D.4.h - Failed to respond.</p> <p>II.D.4.i - Failed to respond.</p> <p>II.D.4.j - Failed to respond.</p> <p>II.E.2 - Failed to respond.</p> <p>III.C.2 - Failed to provide complete information. - Only provided year as to when the physical injury first occurred. Please clarify</p> <p>III.C.2.a - Failed to respond.</p> <p>III.C.2.a.i - Failed to respond.</p> <p>III.C.2.a.ii - Failed to respond.</p> <p>III.C.2.a.iii - Failed to provide complete information. - Failed to provide hospital name. Please clarify</p> <p>III.C.3.a.i - Failed to respond.</p>	
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				<p>III.C.3.a.ii - Failed to provide complete information. - Responded "Yes," but did not describe the type of treatment received. Please clarify</p> <p>III.C.3.b.ii - Failed to respond.</p> <p>III.C.3.b.iii - Failed to provide complete information. - Only listed the year for the procedure. Please clarify</p> <p>III.C.3.b.iii - Failed to provide complete information. - Only listed the year for the procedure. Please clarify</p> <p>III.C.5 - Failed to respond.</p> <p>III.D. - Failed to respond.</p> <p>III.E. - Failed to respond.</p> <p>III.G.a - Failed to respond.</p> <p>III.G.b - Failed to respond.</p> <p>III.G.c - Failed to respond.</p> <p>III.G.1.c - Failed to provide complete information. - Only provided year for date of discussion. Please clarify</p> <p>III.G.2 - Failed to provide complete information. - Only indicated that "Dr. changed medication." This is ambiguous, as it does not specify the content of the conversation. Please clarify</p> <p>III.H. - Failed to respond.</p> <p>IV.C.3 - Failed to provide complete information. - Failed to provide approximate start</p>	
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				<p>dates for either of the two pharmacies listed. Please clarify</p> <p>V.A. - Failed to provide complete information. - Has not identified a cancer diagnosis. Please clarify the time of these measurements.</p> <p>V.G.1 - Failed to provide complete information. - Failed to include "stomach ulcers/peptic ulcers" as a condition in this section despite listing it as a condition she was diagnosed with in the past ten years in the previous section.</p> <p>V.G.4 - Failed to provide complete information. - Ambiguous response for all three listed conditions. Please identify the treatment for colon polyps and stomach polyps, and identify the outcome for hypertension. Please also specify the medication for hypertension.</p> <p>XI.A.1 - Failed to provide properly signed, dated, and completed authorization.</p> <p>XI.A.6 - Failed to provide properly signed, dated, and completed authorization.</p> <p>XI.B.1 - Failed to provide records requested.</p> <p>XI.B.2 - Failed to provide records requested.</p> <p>XI.B.6 - Failed to provide records requested.</p>	
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				<p>XI.B.9 - Failed to provide records requested.</p> <p>XI.B.10 - Failed to provide records requested.</p> <p>XI.B.19 - Failed to provide records requested.</p>	
3.	Colin, Kathryn	20-01290	WATTS GUERRA, LLP	I.C. Failed to attach pharmacy records.	4/28/20
4.	De Los Santos, Delia	19-00406	Farr, Farr, Emerich, Hackett, Carr & Holmes P.A.	<p>I.C.2. Failed to attach records demonstrating product ID</p> <p>I.D.I. Failed to attach records demonstrating alleged injury (colon cancer)</p> <p>III.G.a. thru c. Failed to respond (Medical Expenses chart). Responded: "N/A" to Provider and Expense columns. Date column left blank.</p> <p>V.F.25. Failed to provide complete information. Checked "yes" (re: hypotension), but provided no further information.</p> <p>V.G.4. Failed to provide complete information. Did not provide outcome for each condition.</p> <p>XI.A.1. Failed to provide health care authorization</p> <p>XI.A.6. Failed to provide tax authorization</p> <p>XI.B.1. Checked box indicating documents attached, but there are no documents in MDL Centrality.</p>	3/19/20

				<p>XI.B.2. Checked box indicating documents attached, but there are no documents in MDL Centrality.</p> <p>XI.B.4. Checked box indicating documents attached, but there are no documents in MDL Centrality.</p> <p>XI.B.10. Checked box indicating documents attached, but there are no documents in MDL Centrality.</p> <p>XII. Declaration not signed.</p>	
5.	Holland, Jerry	1:19-cv-07154	Farr, Farr, Emerich, Hackett, Carr & Holmes P.A.	<p>I.C- Failed to attach medical records</p> <p>I.C.2 - Failed to attach records. - Failure to provide prescription and/or pharmacy records.</p> <p>XI.A.1 - Failed to provide properly signed, dated, and completed authorization.</p> <p>XI.B.1 - Failed to provide records requested.</p> <p>XI.B.2 - Failed to provide records requested.</p> <p>XI.B.4 - Failed to provide records requested.</p> <p>XI.B.10 - Failed to provide records requested.</p>	2/24/20
6.	Holoway, Jeanetta	1:19-cv-01235	Watts Guerra	<p>I.D - Failed to respond and/or provide complete information. Plaintiff fails to give remission date, but her response is internally inconsistent with her answers to III.D (asking her whether any valsartan-related illness persists today)</p>	4/24/20

				<p>and V.B (asking her remission weight). Please clarify.</p> <p>III.D - Failed to provide complete information. Plaintiff fails to give remission date at I.D, but her response is internally inconsistent with her answers to III.D (asking her whether any valsartan-related illness persists today) and V.B (asking her remission weight).</p> <p>To the extent Plaintiff still experiences symptoms related to her alleged valsartan-related illness, she must provide the requested information.</p>	
7.	Hutchison, Kathy	20-01503	Cellino & Barnes, PC	<p>I.D. Failed to provide date of cancer diagnosis and omitted whether a remission date is applicable.</p> <p>II.D.4 Omitted dates of exposure for red/processed meats and smoked fish.</p> <p>III.C.3. Omitted procedures and treatments.</p> <p>V.G. Omitted physician information regarding, and failed to provide dates of onset for all conditions.</p>	4/30/20
8.	Kaplan, Dennis	1:19-cv-16067	Golomb & Honik, P.C.	<p>VI.A.1-2 Failed to provide properly signed, undated, and completed authorization.</p>	2/24/20

9.	Kleinman, Priscilla	1:19- cv- 07152	Watts Guerra, LLP	<p>XI.B.2 - Failed to provide records requested. - Failed to provide responsive documents</p> <p>XI.B.12 - Failed to provide records requested. - Failed to provide responsive documents</p> <p>XI.B.13 - Failed to provide records requested. - Failed to provide responsive documents</p> <p>XI.B.14 - Failed to provide records requested. - Failed to provide responsive documents</p>	2/5/20
10.	Kruk, Robert	1:19- cv- 06211	Morgan Law Firm	<p>I.C Failure to attach pharmacy and medical records; failure to provide complete address of prescribing doctor.</p> <p>VI.A Failure to attached completed authorizations in the form approved by the Court.</p> <p>VI.B.1 Failure to attach responsive documents.</p> <p>VI.B.2 Failure to attaching medical records relating to product use.</p> <p>VI.B.4 Failure to attach documents relating to product use instructions.</p> <p>VI.B.6 Failure to attach documents relating to packaging/label.</p> <p>VI.B.7 Failure to attach documents relating to product purchase.</p> <p>VI.B.8 Failure to attach responsive documents.</p>	2/24/20

				VI.B.10 Failure to attach documents relating to communications between Plaintiff and Defendants relating to the product recall.	
11.	Moss, James	1:19-cv-14056	Hollis Law Firm, P.A.	<p>III.G Failed to respond.</p> <p>V.G.3 Failed to provide outcome of hypertension treatment.</p> <p>XI.A.1, 6 Failed to provide properly signed, undated, and completed authorization.</p>	2/19/20
12.	Needy, Lenny	1:19-cv-15051	Golden Law Office	<p>II.D.2.d - Failed to provide complete information. Objections to Collateral Source Rule are not permissible.</p> <p>II.D.2.e - Failed to provide complete information. Objections to Collateral Source Rule are not permissible.</p> <p>V.E.3 - Failed to provide complete information re Alcohol Use history.</p> <p>V.G.3 - Failed to provide complete information.</p> <p>XI.A.1 - Failed to provide properly signed, undated, and completed authorization. Failed to complete provider information and undated authorization.</p> <p>XI.A.4 - Failed to provide properly signed, undated, and completed authorization. -</p>	2/5/20

				<p>Failed to complete provider information and undated authorization.</p> <p>XI.A.5 - Failed to provide properly signed, undated, and completed authorization. - Relevance objections are inadequate and improper response to court-approved fact sheet</p> <p>XI.A.6 - Failed to provide properly signed, undated, and completed authorization. - Objections are an inadequate and improper response to court-approved fact sheet</p> <p>XI.A.7 - Failed to provide properly signed, dated, and completed authorization. - Failed to complete provider information and undated authorization.</p>	
13.	Pate, Eugene	1:20-cv-01248	Watts Guerra	<p>III.G.a Failed to list medical expenses.</p> <p>V.G.4 Failed to provide complete information.</p> <p>- Medication used to treat diabetes and outcome - please clarify and explain the term “ongoing.”</p> <p>- Medication used to treat hypertension in 2013 and the outcome - please clarify and explain the term “ongoing.”</p> <p>- Medication used to treat hypertension in 2014 and the</p>	4/24/20

				outcome - please clarify and explain the term “ongoing.”	
14.	Piccolo, Salvatore	1:20-cv-01624	Cellino and Barnes	<p>V.G.4 Failed to provide complete information - Failed to list specific treatment for hypertension and outcome.</p> <p>XI.A.1 - Failed to provide completed and undated authorization.</p> <p>XI.A.6 - Failed to provide completed and undated authorization.</p>	5/4/20
15.	Rich, Earline	1:19-cv-20643	Watts Guerra, LLP	<p>V.D1.b Failed to provide the date that decedent’s tobacco use started.</p> <p>V.D1.d.i-iii Failed to state the amount of tobacco decedent used, on average, per day, and for how many years.</p> <p>V.G.3 Failed to provide the onset dates for decedent’s Hypertension, Nausea, Vomiting and Diabetes.</p> <p>V.G.3 Failed to state the specific medication decedent received for Hypertension, Nausea, Vomiting and Diabetes.</p> <p>XI.A.1, 6 Failed to provide properly signed, undated, and completed authorization.</p>	2/11/20

16.	Richissin, Fred	1:19-cv-20407	Gainsburgh Benjamin	<p>I.D Failure to respond and to attach pharmacy and medical records showing injury.</p> <p>III.D Failure to respond.</p> <p>III.G.a Failure to provide list of medical expenses.</p> <p>V.G.4 Failure to provide treatment received and outcome.</p> <p>XI.A.1, 6 Failure to provide proper authorization.</p> <p>XI.B.17, 18, 21-23 Failure to respond.</p> <p>XI.B.9, 11, 12, 16 Failure to provide requested records.</p> <p>XII Failure to provide signed and dated declaration.</p>	2/5/20
17.	Stano, David	1:19-cv-18080	Gennusa Piacun & Ruli	<p>I.C.2 - Failed to attach records.</p> <p>I.D.1 - Failed to attach records.</p> <p>I.D.2 - Failed to respond.</p> <p>I.D.3 - Failed to respond.</p> <p>I.D.4 - Failed to respond.</p> <p>I.D.5 - Failed to respond.</p> <p>I.D.6 - Failed to respond.</p> <p>I.D.7 - Failed to respond.</p> <p>I.D.8 - Failed to respond.</p> <p>III.C.1 - Failed to respond.</p>	2/5/20

				<p>III.C.2.a - Failed to respond.</p> <p>III.C.3 - Failed to respond.</p> <p>III.C.3 - Failed to respond.</p> <p>III.C.3.a.i - Failed to respond.</p> <p>III.C.3.a.ii - Failed to respond.</p> <p>III.C.3.b - Failed to respond.</p> <p>III.C.3.c.i - Failed to respond.</p> <p>III.D.3 - Failed to respond.</p> <p>III.G.a - Failed to respond.</p> <p>III.G.b - Failed to respond.</p> <p>III.G.c - Failed to respond.</p> <p>III.H. - Failed to respond.</p> <p>IV.C.2 - Failed to provide address and telephone number for Humana Pharmacy and failed to provide telephone number for All Saints Pharmacy. Please clarify</p> <p>IV.C.3 - Failed to provide approximate begin dates for Humana Pharmacy and All Saints Pharmacy. Please clarify</p> <p>V.D1.a - Failed to respond.</p> <p>V.D1.b - Failed to respond.</p> <p>V.D1.d - Failed to provide complete information. - Amount used is ambiguous. Please clarify</p> <p>V.D1.d.i - Failed to provide complete information. - On</p>	
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				<p>average is ambiguous. Please clarify</p> <p>V.D1.d.(iii) - Failed to respond.</p> <p>V.E.1 - Failed to respond.</p> <p>V.F.27 - Failed to respond.</p> <p>V.F.45 - Failed to respond.</p> <p>V.F.46 - Failed to respond.</p> <p>V.F.47 - Failed to respond.</p> <p>V.F.49 - Failed to respond.</p> <p>V.F.50 - Failed to respond.</p> <p>V.F.51 - Failed to respond.</p> <p>XI.A.1 - Failed to provide properly signed, dated, and completed authorization. - Failed to provide requisite number of health care authorizations. Please supplement</p> <p>XI.A.1 - Failed to provide properly signed, dated, and completed authorization. - Failed to provide requisite number of health care authorizations. Please supplement</p> <p>XI.A.6 - Failed to provide properly signed, dated, and completed authorization.</p> <p>XI.A.7 - Failed to provide properly signed, dated, and completed authorization.</p>	
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				<p>XI.B.10 - Failed to provide records requested.</p> <p>XI.B.18 - Failed to provide records requested. - Also inconsistent with Section III.G where no medical expenses were listed. Please clarify</p>	
18.	Strozewski, Terence	1:20-cv-01423	Cellino and Barnes	<p>I. D Incomplete date of diagnosis.</p> <p>XI. A. 1 Failure to attach completed Health Care Authorization.</p> <p>XI. A. 4 Failure to attach Workers' Compensation Authorization.</p> <p>XI. A. 5 Failure to attach completed Release of Disability Records Authorization.</p> <p>XI. A. 6 Failure to attach completed Insurance Records Authorization.</p>	4/30/20
19.	Witte, Laurence	1:19-cv-16971	Matías J. Adrogué, PLLC	<p>IV.C.2 - Failed to provide address and phone number for CVS Pharmacy. Please clarify</p> <p>IV.C.3 - Failed to provide approximate dates for CVS Pharmacy. Please clarify</p> <p>V.G.2 - Failed to identify name, address, and phone number of treating health care provider for pulmonary embolism/blood clot in lung. Please clarify</p> <p>V.G.3 - Failed to identify any approximate dates of onset. Please clarify</p>	2/4/20

				<p>VII.A.4.b - Failed to identify primary oncologist or physician and dates of treatment for basal cell carcinoma. Failed to identify primary oncologist or physician and dates of treatment for skin cancer. Please clarify</p> <p>XI.A.1 - Failed to provide properly signed, dated, and completed authorization.</p> <p>XI.A.6 - Failed to provide properly signed, dated, and completed authorization.</p>	
20.	Young, Lester	1:20-cv-01507	Cellino and Barnes	<p>III. D. 1. Failure to respond. No symptom provided for prostate cancer.</p> <p>V. G Failure to provide name of medication and outcome.</p> <p>XI. A. 1, 6 Failure to attach completed Authorization.</p> <p>XI. B. 23 Failure to attach bankruptcy documents.</p>	4/30/20
21.	Zuckerman, Sheila	20-01883	GARY F. FRANK E CO., L.P.A.	<p>III.G. Did not provide itemized medical expenses by provider as indicated would be produced.</p>	5/6/20

TABLE C:
PLAINTIFFS WHO HAVE NOT AMENDED/SUPPLEMENTED FACT SHEETS
FOLLOWING DEFICIENCY NOTICE (FIRST LISTING)

	Plaintiff	Civil Action No.	Law Firm	Deficiencies	Deficiency Notice Sent
1.	Byrd, Nita Lacey	20-cv-01081	Oliver Law Group P.C.	<i>See Deficiency Notice</i>	2/24/20
2.	Estate of Hewitt	20-00335	Benkie & Crawford	<i>See Deficiency Notice</i>	2/18/20
3.	Herrin, Clinton	19-cv-14738	Hollis Law Firm, P.A.	<i>See Deficiency Notice</i>	2/18/20
4.	Huey, James	19-cv-15637	Gainsburgh Benjamin	<i>See Deficiency Notice</i>	3/4/20
5.	King, Jon	19-15648	Gainsburgh, Benjamin, David, Meunier & Warhauer L.L.C.	<i>See Deficiency Notice</i>	3/5/20
6.	Leboeuf, Curtis	19-12208	Hollis Law Firm, P.A.	<i>See Deficiency Notice</i>	2/19/20
7.	Lewis, Linda	1:20-cv-00629	Law Offices of John D. Sileo LLC	<i>See Deficiency Notice</i>	4/24/20

TABLE D:
PLAINTIFFS WHO HAVE AMENDED/SUPPLEMENTED FACT SHEETS
WITH WHOM DISPUTES REMAIN (FIRST LISTING)

	Plaintiff	Civil Action No.	Law Firm	Core Deficiencies	Deficiency Notice Sent
1.	Brock, Deloris	2020-CV-00224	Oliver Law Group, P.C.	XI.B.3 - Failed to provide records requested - Plaintiff attached radiology reports, but failed to provide any x-rays, CT scans, MRIs or	4/27/20

				<p>radiographic images (Failure to attach records identified in Section XI, to the extent Plaintiff indicates that they are in possession of such records)</p> <p>XI.B.21 - Failed to provide records requested – Letters of testamentary. (Failure to attach records identified in Section XI, to the extent Plaintiff indicates that they are in possession of such records)</p>	
2.	Crawford, Rita	1:20-cv-00763	Goldenberg Law, PLLC	<p>III.G.a Only pharmacy bills produced. Please confirm that these are the only medical expenses for which plaintiff seeks recovery in the action which plaintiff has filed. If there are additional expenses, please provide an answer to this question.</p> <p>V.G.3 Failed to provide complete information. Failed to state outcome from hypertension treatment.</p>	4/13/20
3.	Dawson, Nellie	2020-CV-01493	Watts Guerra, LLP	<p>III.G.b - Failed to respond. No dates. (Failure to complete any subsection associated with a specific damages claim, to the extent claimed)</p> <p>V.G.3 - Failed to respond. No onset date for constipation. (Failure to complete medical conditions table and provide information on medical providers for identified conditions)</p> <p>V.G.3 - Failed to respond. No onset date for kidney disease.</p>	4/30/20

				<p>(Failure to complete medical conditions table and provide information on medical providers for identified conditions)</p> <p>V.G.3 - Failed to respond. No onset date for colitis. (Failure to complete medical conditions table and provide information on medical providers for identified conditions)</p> <p>XI.A.6 - Failed to provide properly signed, dated, and completed authorization - no address listed for insurance company. (Failure to provide complete and properly executed authorizations)</p>	
4.	Duello, Denis	2020-CV-01758	Levin Papantonio	I.D.5- Failed to provide complete information – wrote unknown highest stage cancer diagnosis. (Failure to indicate type of cancer and date of diagnosis)	5/5/20
5.	Fields, Tivis	1:20-cv-00683	Williams Hart Boundas Easterby, LLP	III.G.a Failed to respond.	5/12/20
6.	Freeman, Timothy	19-cv-22181	Goldenberg Law, PLLC	III.G.b - Failed to respond. – Response is “see billing” (Failure to complete any subsection associated with a specific damages claim, to the extent claimed)	3/20/20
7.	Hall, Travis	1:20-cv-03534	Farris, Riley & Pitt, LLP	X.A Failed to provide complete information - Plaintiff claims to be personal representative in section I.E	5/26/20

				<p>but fails to attach letters of administration demonstrating she is decedent's personal representative.</p> <p>XI.A.1 Failed to provide properly signed, dated, and/or completed authorization - Plaintiff does not attach documents demonstrating power of attorney to release Decedent's medical records.</p> <p>XI.A.6 Failed to provide properly signed, dated, and/or completed authorizations.</p> <p>Further, Plaintiff does not demonstrate power of attorney to release decedent's health insurance records.</p>	
8.	Ham, Jessie	19-cv-19585	Hollis Law Firm, P.A.	<p>I.C Failed to attach copies or photographs of prescription bottles referenced in Section III.B.5 - Failure to provide medical records referenced in PFS or to indicate responsive records have been requested</p> <p>XI.A(6) Health Insurance Records Authorization - Failure to provide complete and properly executed authorizations</p>	1/15/20
9.	Kinkela, Silvano	1:20-cv-02880	Davis & Crump, PC	<p>III. G Failure to respond.</p> <p>III. H Failure to respond.</p>	5/22/20
10.	Mabie, Lucille	19-cv-18563	Hollis Law Firm, P.A.	<p>XI.A.1 - Failed to provide properly signed, dated, and completed authorization - Incorrectly labeled as Ex. C. It is dated. (Failure to provide complete and properly executed authorizations)</p>	2/18/20

				<p>XI.A.2 - Failed to provide properly signed, dated, and completed authorization - included, but no claim made in PFS under III.F. (Failure to provide complete and properly executed authorizations)</p> <p>XI.A.3 - Failed to provide properly signed, dated, and completed authorization- Incorrectly labeled as Ex. A. included, but no claim made in PFS under III.F. It is dated. (Failure to provide complete and properly executed authorizations)</p> <p>XI.A.4 - Failed to provide properly signed, dated, and completed authorization - included, but no claim made in PFS under II.F. (Failure to provide complete and properly executed authorizations)</p> <p>XI.A.5 - Failed to provide properly signed, dated, and completed authorization - included, but no claim made in PFS under II.F. (Failure to provide complete and properly executed authorizations)</p> <p>XI.A.6 - Failed to provide properly signed, dated, and completed authorization - it is dated. (Failure to provide complete and properly executed authorizations)</p> <p>XI.A.7 - Failed to provide properly signed, dated, and completed authorization -</p>	
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				included, but no claim made in PFS under III.F. (Failure to provide complete and properly executed authorizations)	
11.	Nealy, Hunter	19-cv-19609	The Cochran Firm	III.G -Medical expenses “to be supplemented” (Failure to complete any subsection associated with a specific damages claim, to the extent claimed (lost wages, emotional injury, etc.))	1/29/20
12.	Nelson, Gerald	19-cv-332	Golomb & Honik, P.C.	VI.A.1. - Failed to provide properly signed, dated, and completed authorization - Please provide an undated authorization per the instructions in Section VI.A.1. (Failure to provide complete and properly executed authorizations) VI.A.2. - Failed to provide properly signed, dated, and completed authorization - Please provide an undated authorization per the instructions in Section VI.A.2 (Failure to provide complete and properly executed authorizations)	2/24/20
13.	Reilly, Eugene	1:20-cv-02216	Watts Guerra LLP	I. C. 3-19 Failure to respond. III. G. a-c Failure to respond. XI. B. 14 Failure to attach responsive documents.	5/11/20
14.	Rodich-Annese, Valerie	1:19-cv-07161	Migliaccio & Rathod	VI.A - Failed to provide completed and undated authorizations.	2/21/20
15.	Stine, Terry	2019-CV-	Axley Brynson, LLP	V.G.2 – Failed to provide information for diagnosed obesity. (Failure to complete	2/3/20

		2021 4		<p>medical conditions table and provide information on medical providers for identified conditions.)</p> <p>V.G.3 – Failed to provide information for diagnosed obesity. (Failure to complete medical conditions table and provide information on medical providers for identified conditions.)</p> <p>V.G.4 – Failed to provide information for diagnosed obesity. (Failure to complete medical conditions table and provide information on medical providers for identified conditions.)</p> <p>X.I.B.3 – Failed to attach records. (Failure to attach records identified in Section XI, to the extent Plaintiff indicates that they are in possession of such records.)</p> <p>X.I.B.4 – Failed to attach records. (Failure to attach records identified in Section XI, to the extent Plaintiff indicates that they are in possession of such records.)</p>	
16.	Taylor, Cynthia	2020-CV-01510	Cellino & Barnes, PC	<p>XI.A.1 - Failed to provide properly signed, dated, and completed authorization. (Failure to provide complete and properly executed authorizations)</p> <p>XI.A.4 - Failed to provide properly signed, dated, and completed authorization. (Failure to provide complete</p>	4/30/20

				<p>and properly executed authorizations.)</p> <p>XI.A.5 - Failed to provide properly signed, dated, and completed authorization. (Failure to provide complete and properly executed authorizations)</p> <p>XI.A.6 - Failed to provide properly signed, dated, and completed authorization. (Failure to provide complete and properly executed authorizations)</p> <p>XI.A.7 - Failed to provide properly signed, dated, and completed authorization. (Failure to provide complete and properly executed authorizations)</p>	
17.	Tucker, Kattie	19-cv-18331	The Cochran Firm - Dothan	<p>I. Remission Date - Provide date or indicate “N/A” as applicable. (Failure to indicate type of cancer and date of diagnosis)</p> <p>XI Health Care Authorization- Please provide an undated authorization per the instructions in Section VI.A.1. (Failure to provide complete and properly executed authorizations)</p> <p>XI Insurance Records Authorizations – Please provide an undated authorization per the instructions in Section VI.A.1. (Failure to provide complete and properly executed authorizations)</p>	1/30/20

18.	Wester, Selena	1:20-cv-01123	Oliver Law Group PC	<p>I.D.6 - Failed to provide complete information. Plaintiff does not provide a remission date. Plaintiff's answer is inconsistent with her answer at III.D, where she states that her valsartan-related injury/illness does not persist today. Please clarify.</p> <p>II.D.4 Failed to respond to this section.</p> <p>III.C.2 Incomplete dates related to non-cancer physical injury claimed</p> <p>III.C.3.a-c Failed to provide complete information. Plaintiff fails to provide full names of treating physicians and medications prescribed.</p> <p>Plaintiff fails to provide date of knee replacement.</p> <p>Please confirm that plaintiff received "radiation treatment" for knee replacement.</p> <p>III.D Plaintiff's answer to III.D is inconsistent with her answers to I.D.6. Plaintiff states her illness does not persist today but does not state a remission date.</p> <p>XI.A.1, 5, 6 Failed to provide properly signed, undated, and/or completed authorizations.</p>	5/21/20
19.	Weygandt, Robert	19-cv-20970	Williams, Hart, Boundas,	XI.B.23 - Failed to provide records requested – No bankruptcy petition provided, only discharge order	3/24/20

			Easterby LLP	provided. (Failure to attach records identified in Section XI, to the extent Plaintiff indicates that they are in possession of such records.)	
20.	Wilson, Winnifried	20- cv- 0045 8	Moore Law Group PLLC	<p>III.G.a - Failed to respond – response is “will supplement” (Failure to complete any subsection associated with a specific damages claim, to the extent claimed)</p> <p>III.G.b - Failed to respond – response is “will supplement” (Failure to complete any subsection associated with a specific damages claim, to the extent claimed)</p> <p>III.G.c - Failed to respond – response is “will supplement” (Failure to complete any subsection associated with a specific damages claim, to the extent claimed)</p>	3/25/20
21.	Wineinger , Brian	1:19- cv- 0107 0	Bursor & Fisher PA	<p>IV Failed to provide complete dates when Losartan. Failed to provide frequency of use for all medications listed.</p> <p>VI.A.1, 6 Failed to provide properly signed, undated, and completed authorization. Authorizations incomplete.</p>	2/24/20

TABLE E:
CONSUMER PUTATIVE ECONOMIC LOSS CLASS REPRESENTATIVES WHO
HAVE AMENDED/SUPPLEMENTED FACT SHEETS
WITH WHOM DISPUTES REMAIN (FIRST LISTING)

	Plaintiff	Civil Action No.	Law Firm	Remaining Substantial Deficiencies	Deficiency Notice Sent
1.	Byrd, Cecil	19-08591, <i>Duffy, et al.</i>	Bursor & Fisher, P.A.	Refuses to produce unredacted pharmacy records.	2/24/20
2.	Erwin, Eric	18-cv-13347	Golomb & Honik, P.C.	VI.B.1. - Failed to provide records requested – (Authorization is a template, not filled out to anyone in particular) VI.B.2. - Failed to provide records requested (Health records authorization is a template, not filled out to anyone in particular)	2/24/20
3.	Hamel, Jo	18-01405, <i>Judson, et al.</i>	Golomb & Honik, PC	I.C.2. Failed to provide complete information. Records are redacted. Please re-produce without redactions. III.B.4.a. Failed to provide complete information. Failed to describe oral instructions from pharmacist. VI.B.8. Failed to attach records.	3/5/20
4.	O'Neill, Richard	18-14840	Sharp Barton, LLP	II.A.1. – Failed to respond. Please respond “N/A” if this does not apply. VI.A.I. – Health Care Auth. should not be dated. VI.B.6. – Failed to respond. (Doc Request for copies of packaging)	2/24/20

5.	Roberts, Robin	18-cv-16075	Golomb & Honik, P.C.	<p>VI.B.1. - Failed to provide records requested – (Authorization is a template, not filled out to anyone in particular)</p> <p>VI.B.2. - Failed to provide records requested (Health records authorization is a template, not filled out to anyone in particular)</p>	2/24/20
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TABLE F:
PLAINTIFFS WHO HAVE NOT FILED PFS BY DEADLINE (FIRST LISTING)

	Plaintiff	Civil Action No.	Law Firm	Deficiencies	PFS Due (60 days + SFC)
1.	Avedikian, Kevork	2019 -CV- 06822	Levin Papantonio	Failed to File PFS	<p>SFC: 9/19/19</p> <p>PFS Due: 11/18/19</p>
2.	Babin, Amanda	19-14649	Damon J. Baldone and Associates, APLC	Failed to File PFS	<p>Original SFC- 1/24/20, 1st Am. SFC – 6/2/20</p> <p>PFS Due: 3/24/20</p>
3.	Branham, Norma	19-cv-21816	Goldenberg Law, PLLC	Failed to File PFS	<p>SFC: 1/21/20</p> <p>PFS Due: 3/21/20</p>
4.	Cantrell, Marcia	2019-cv-14891	Golden Law Office	Failed to File PFS	<p>SFC: 9/11/19</p> <p>PFS Due: 11/10/19</p>
5.	Cave, Robert	2020 -CV- 01627	Levin Papantonio	Failed to File PFS	SFC: 2/14/20

	Plaintiff	Civil Action No.	Law Firm	Deficiencies	PFS Due (60 days + SFC)
					PFS Due: 4/15/20
6.	Daring	Medical Monitoring Class Rep.	THE HOLLIS LAW FIRM P.A.	Failed to File PFS	
7.	DeShields, Nettie	20-01030	Douglas & London	Failed to File PFS	SFC: 1/30/20 PFS: 3/30/20
8.	Dufrene, Lana	2019 - CV- 15633	Gainsburgh Benjamin	Failed to File PFS	SFC: 9/20/19 PFS Due: 11/19/19
9.	Estate of Margaret Cicciarelli	20-02821	Levin Papantonio	Failed to File PFS	SFC: 3/14/20 PFS Due: 4/15/20
10.	Fougere, Therese	19-17597	Law Offices of Pius A. Obioha & Associates, LLC	Failed to File PFS	SFC: 1/29/20 PFS Due: 3/29/20
11.	Guiton, Susan	2019 -CV- 07145	Kirtland & Packard	Failed to File PFS	SFC: 1/24/20 PFS Due: 3/24/20
12.	Hebert, Betty	19-14647	Damon J. Baldone and Associates, APLC	Failed to File PFS	SFC: 1/24/20 PFS Due: 3/24/20
13.	Jones, Philip	20-cv- 2795	Douglas & London	Failed to File PFS	SFC: 3/13/20 PFS Due: 4/14/20
14.	Lasseigne, Beverly	2020 -CV- 03611	Law Offices of John D. Sileo LLC	Failed to File PFS	SFC: 4/3/20 PFS Due: 6/2/20

	Plaintiff	Civil Action No.	Law Firm	Deficiencies	PFS Due (60 days + SFC)
15.	Lide, Bobby	2020 -CV- 02819	Levin Papantonio	Failed to File PFS	SFC: 3/14/20 PFS Due: 4/15/20
16.	Littlejohn, Harvey	20-cv- 4401	Watts Guerra, LLP	Failed to File PFS	SFC : 4/17/20 PFS Due: 6/16/20
17.	Long, Nellie	2020 -CV- 2875	Golden Law Office	Failed to File PFS	SFC :3/12/20 PFS Due: 4/13/20
18.	Lucas, Larry	2020 -CV- 4410	Hollis Law Firm, P.A.	Failed to File PFS	SFC: 4/17/20 PFS Due: 6/16/20
19.	Maxine, Guillory	2019 - CV- 10044	Levin Papantonio	Failed to File PFS	SFC: 9/19/20 PFS Due: 11/18/20
20.	Meade, Karen	19-15351	Kirtland & Packard	Failed to File PFS	SFC: 1/24/20 PFS Due: 3/24/20
21.	Mullins, James	19-15043	Golden Law Office	Failed to File PFS	SFC Original – 9/11/19, SFC 1 st Am. – 6/8/20 PFS Due: 11/10/19
22.	Murray, Brian	2020 -CV- 01055	Levin Papantonio	Failed to File PFS	SFC :1/30/20 PFS Due: 3/30/20
23.	Patton, Beverly	19-17609	McGrail & Associates, LLC	Failed to File PFS	SFC: 2/21/20 PFS Due: 4/21/20
24.	Pittman, Charleston	2019 -CV- 15638	Law Offices of John D. Sileo LLC	Failed to File PFS	SFC: 4/3/20 PFS Due: 6/2/20

	Plaintiff	Civil Action No.	Law Firm	Deficiencies	PFS Due (60 days + SFC)
25.	Pizzolato, Brad	2020 -CV- 02820	Levin Papantonio	Failed to File PFS	SFC: 3/14/20 PFS Due: 5/13/20
26.	Rives	Medical Monitoring Class Rep.	THE HOLLIS LAW FIRM P.A.	Failed to File PFS	
27.	Roberts, Gaston	2020 -CV- 00946	Hare Wynn Newell & Newton	Failed to File PFS	SFC: 1/29/20 PFS Due: 3/29/20
28.	Williamson, Russell	20-02356	GREEN SCHAFLE & GIBBS	Failed to File PFS	SFC Original 3/12/20 SFC 1 st Am. – 4/6/20, SFC 2 nd Am. -6/16/20 PFS Due: 5/11/20
29.	Shittu, Beecroft	2020 -CV- 03179	Levin Papantonio	Failed to File PFS	SFC: 3/24/20 PFS Due: 5/23/20
30.	Somogyi, Paul	2020 -CV- 02822	Levin Papantonio	Failed to File PFS	SFC: 3/14/20 PFS Due: 5/13/20
31.	Stewart, Donald	19-21475	Stark & Stark, P.C.	Failed to File PFS	SFC : 1/27/20 PFS Due: 3/27/20
32.	Troiano, Diane	2020 -CV- 02341	Green & Schafle LLC	Failed to File PFS	SFC Original-3/13/20 SFC 1 st Am – 4/27/20 SFC 2 nd Am – 6/16/20 PFS Due: 5/12/20
33.	Williams, Charles	2019 - CV- 07632	Levin Papantonio	Failed to File PFS	SFC: 9/20/19 PFS Due: 11/19/19